

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

HEINZ AVE., SUITE 200
BERKELEY, CA 94710-3724

August 4, 1995

RECEIVED**AUG 08 1995**

Commander
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Camille Garibaldi
900 Commodore Drive
San Bruno, California 94066-2402

Dear Ms. Garibaldi:

REMOVAL ACTIONS AT SITE 14, 16 AND 18, NAVAL AIR STATION, ALAMEDA

The California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) has reviewed the preliminary draft Engineering Evaluation/Cost Analysis-Removal Action Workplans for Sites 14 and 16. This letter transmits our comments on these documents. We would also like to provide early input to the removal action for Site 18. The purpose for the preliminary review has been to aid in scoping the upcoming removal actions. The following comments are provided to assist in this scoping.

Site 14**1. Section 3.4 Potential Applicable or Relevant and Appropriate Requirements**

This section should not only list potential ARARs, but should also describe how the requirements will be met through the removal action. This is especially critical where ARARs identify permit requirements that must be substantively met, although acquiring a permit is not necessary. California Health and Safety Code Section 25358.9 empowers the DTSC to exclude any portion of a response action conducted entirely onsite from the hazardous waste facility permit requirements if both of the following are apply:

(1) The removal or remedial action is carried out pursuant to a removal action workplan or a remedial action plan prepared pursuant to H&SC Section 25356.1.

(2) The removal action workplan or the remedial action plan requires that the response action complies with all laws, rules, regulations, standards, and requirement, criteria, or limitations applicable to the construction, operation, and closure of the type of facility at the hazardous substance release site and with any other condition imposed by the DTSC as necessary to protect public health and safety and



Ms. Garibaldi
August 4, 1995
Page Two

2. Section 3.4 Potential Applicable or Relevant and Appropriate Requirements

The amendments and additions to California Health and Safety Code by Senate Bill 1706 went into affect on January 1, 1995. This State Law shall not be classified as "To be considered" but instead as applicable law.

Site 16

1. Page 1-1, last paragraph

Both the Department of Toxic Substances Control and the Regional Water Quality Control Board are part of the California Environmental Protection Agency.

2. Section 2.5 Streamlined Risk Evaluation

Please clarify the locations of sample concentrations used to calculate the level of residual surface soil contamination for lead and PCB. Were all the sample locations used in the calculation, or only the samples taken above one foot?

3. Section 3.4, Applicable or Relevant and Appropriate Requirements.

Please refer to the above comments number one and two for Site 14.

4. Section 3.5, Removal Action Objectives, second bullet

Please specify that the target residual levels of PCB and lead will be calculated by taking the average surface soil concentrations at the site.

5. Section 4.0, Identification and Screening of General Removal Actions and Technologies

An additional alternative was identified at the July 28, 1995 removal action proposal meeting. This alternative involved the excavation of contaminated soil and the storage of that soil in a soil stockpile area. Once removed to the soil stockpile area, treatability studies will be conducted to determine the appropriate treatment technology. At the Restoration Advisory Board meeting on August 1, 1995, Moju presented the favored alternative as excavation, placement in a CAMU, and treatment by soil washing or solvent extraction. Please clarify the Navy's position on the favored alternative. Further, the DTSC is not certain that establishing a CAMU is the most appropriate

Ms. Garibaldi
August 4, 1995
Page Three

regulatory vehicle for the storage and treatment of contaminated soil. A soil storage and treatment area can be established simply through an approved Removal Action Workplan or Interim Remedial Action Plan (see above comment 1).


Site 18

1. General Comment

Early discussions with EFA-West project managers indicate that solid and/or sediments removed from the storm sewer system may be taken to an on-site storage facility for treatability studies prior to treatment. We are concerned that the types of contaminants found in the sediment will make the sediment very difficult to treat. Land disposal of the sediment may be the only available alternative for this type of contaminated sediment. However, efforts to reduce the amount of waste going offsite for disposal should be implemented. These may include: dewatering of sediment, sludges, and debris; segregating solids that are heavily contaminated with multi-contaminants from those that are less contaminated with few contaminants; recycling of water used to clean out sewer lines; and on-site treatment of wash water.

Thank you for the opportunity to review and provide comments on these preliminary draft documents. If you have any questions regarding this letter, please call me at (510) 540-3809.

Sincerely,



Thomas P. Lanphar
Project Manager
Base Closure Branch

cc: See next page

Ms. Garibaldi
August 4, 1995
Page Four

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